

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

---

**MOTIVATION INNOVATIONS, LLC**

**Plaintiff,**

**v.**

**EXPRESS, INC., ULTA SALON,  
COSMETICS & FRAGRANCE, INC.,  
PETSMART, INC., and VICTORIA'S  
SECRET STORES, LLC d/b/a VICTORIA'S  
SECRET,**

**Defendants.**

---

**Civil Action No.: 11-00615 (SLR)**

**JURY TRIAL DEMANDED**

**MOTION AND ORDER FOR ADMISSION *PRO HAC VICE***

Pursuant to Local Rule 83.5 and the attached certification, counsel moves the admission *pro hac vice* of Matthew C. Berntsen, Esquire of Ward & Zinna, LLC, 380 Madison Avenue, New York, New York 10017, to represent Defendants Victoria's Secret Stores, LLC and Express, Inc. in the above matter. Pursuant to this Court's Standing Order effective January 1, 2005, I hereby certify that the annual fee for *pro hac* admission for Mr. Berntsen will be sent as required.

Respectfully submitted,

Date: September 12, 2011

By: /s/ Sheldon K. Rennie  
Sheldon K. Rennie (Del. Bar No. 3772)  
FOX ROTHSCHILD LLP  
919 North Market Street, Suite 1300  
Wilmington, Delaware 19801  
Phone: (302) 622-4202  
Fax: (302) 656-8920  
E-mail: srennie@foxrothschild.com

*Attorney for Defendants  
Victoria's Secret Stores, LLC and Express, Inc.*

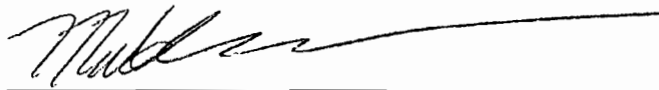
**CERTIFICATION BY COUNSEL TO BE ADMITTED *PRO HAC VICE***

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bars of the State of New York and the Commonwealth of Massachusetts, and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules.

In accordance with Standing Order for District Court Fund effective January 1, 2005, I further certify that the annual fee of \$25.00 has been paid to the Clerk of Court, or, if not paid previously, the fee payment will be submitted to the Clerk's Office upon the filing of this motion.

Date: \_\_\_\_\_

9/9/2011



Matthew C. Berntsen  
Ward & Zinna, LLC  
380 Madison Avenue  
New York, New York 10017  
Phone: (212) 697-6262  
Fax: (212) 972-5866